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8 Attorney for: Plaintiff OSCAR CRUZ

FILED
12 AUG - 1 PM 1:47
CLERK OF DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 OSCAR CRUZ, an Individual;

12 Plaintiff,

13 vs.

14 TRANS UNION, LLC. is a corporation;
15 and DOES 1-10, Inclusive,

16 Defendants.

Case No. CV12-06633 GAF(VBKx)

COMPLAINT FOR DAMAGES:

1. FAIR CREDIT REPORTING ACT.

JURY TRIAL DEMANDED.

21 Plaintiff alleges:

22 1. Plaintiff OSCAR CRUZ ("Plaintiff") is a resident of County of Los
23 Angeles, State of California.

24 2. Defendants TRANSUNION, CORP., ("TRANSUNION") is a business
25 entity, form unknown, doing business in the State of California as credit bureau
26 which receives negative credit information about consumers and which then
27 publish such information in credit reports available to its subscribers.
28

COMPLAINT FOR DAMAGES

1 3. Defendants DOES 1-10 are individuals and business entities, form
2 unknown, doing business in the State of California as credit reporting agencies,
3 debt collection agencies, creditors or other persons or entities which engage in
4 credit reporting and/or debt collection. DOES 1-10, Inclusive, includes
5 individuals or business entities doing business in the State of California as credit
6 reporting agencies, debt collectors and/or creditors who have refused to delete
7 accounts of plaintiff that were procured through identity theft, mixed file or other
8 manner of recording an inaccurate credit account, even after plaintiff has notified
9 them of the false or inaccurate derogatory, and also who have reported such
10 accounts as derogatory credit references to credit reporting agencies.

11 4. Plaintiff does not know the true names and capacities, whether corporate,
12 partnership, associate, individual or otherwise of Defendants sued herein as Does
13 1 through 10, inclusive, under the provisions of Section 474 of the California
14 Code of Civil Procedure. Plaintiff is informed and believes and on that basis
15 alleges that Defendants Does 1 through 10, inclusive, are in some manner
16 responsible for the acts, occurrences and transactions as officers, directors or
17 managing agents of Defendants or as its agents, servants, employees and/or joint
18 venturers and as set forth in this complaint, and that each of them are legally liable
19 to Plaintiff, as set forth below and herein:

20 a) Said Officers, directors or managing agents of Defendants personally
21 acted willfully with respect to the matters alleged in this complaint;

22 b) Said officers, directors or managing agents of Defendants personally
23 authorized, approved of, adopted and/or ratified the acts alleged herein or the
24 agents, servants, employees and/or joint venturers of Defendants did so act;

25 c) Said officers, directors or managing agents of Defendants personally
26 participated in the acts alleged herein of Defendants;

1 d) Said Officers, directors or managing agents of Defendants personally had
2 close supervision of their agents, servants, employees and/or joint venturers of
3 Defendants;

4 e) Said Officers, directors or managing agents of Defendants personally
5 were familiar with the facts regarding the matters alleged herein;

6 f) Said Officers, directors or managing agents of Defendants personally
7 failed to investigate the circumstances appertaining to the acts alleged herein.
8 They also failed and refused to repudiate the herein alleged actions and failed to
9 redress the harm done to Plaintiff. Further, said Officers, directors, or managing
10 agents of Defendants failed and refused to punish or discharge the said agents,
11 servants, employees and/or joint venturers of Defendants, even after learning of
12 the acts of the agents, servants, employees and/or joint venturers of Defendants.
13 Plaintiff will seek leave to amend this complaint to set forth the true names and
14 capacities of said fictitiously named Defendants as enumerated above, together
15 with appropriate charging allegations, when learned.

16 5. Plaintiff is informed and believes, and thereon alleges that at all relevant
17 times herein each Defendant, whether actually or fictitiously named, was the
18 principal, joint venturer, agent, servant or employee of each other Defendant, and
19 in acting as such within the course, scope and authority of such relationship, took
20 some part in the acts and omissions hereinafter set forth, by reason of which each
21 Defendant is liable to Plaintiff for the relief prayed for in this complaint, and any
22 future amended complaint. Further, Plaintiff alleges that each act alleged herein,
23 whether by a named Defendants or fictitiously named Defendants or otherwise,
24 was expressly authorized or ratified, as these terms are used in California Civil
25 Code Section 3294(b), by each and every other Defendant herein, whether named
26 or fictitiously named.

FIRST CAUSE OF ACTION

**[VIOLATION OF THE FAIR CREDIT REPORTING ACT
AGAINST ALL DEFENDANTS]**

6. Plaintiff re-alleges and incorporates all preceding paragraphs as though set forth in full in this cause of action.

7. Plaintiff is a consumer as this term is defined by 15 U.S.C. Sec. 1681a(c) of the Fair Credit Reporting Act. All defendants are "furnishers" as defined by 15 U.S.C. 1681s-2 of the Fair Credit Reporting Act, except, TRANSUNION a credit bureau defendant who is a "consumer reporting agencies" as that term is defined in 15 U.S.C. Section 1681a (f).

8. On or about June 24, 2010, Plaintiff received correspondence from HomeEq Servicing advising him that they were unable to offer him a loan modification based on information received from TRANSUNION.

9. On or about December 29, 2010, Plaintiff filed a police report; case #11-0000593 notifying the police department of the identity theft crime committed against him based on the California Code Section 530.5(a) PC.

10. On or about January 7, 2011, Plaintiff sent a copy of the police report along with dispute letters to TRANSUNION, Experian and Equifax requesting that they remove the many forged accounts including Discover, Inland Empire CU, Suntrust Bank and US Bank that did not belong to him, which were appearing on his credit profile. Both Experian and Equifax removed the Discover, Inland Empire CU, Suntrust Bank and US Bank accounts.

11. On or about January 12, 2010, TRANSUNION responded to Plaintiff's request removing some of the inaccurate accounts but failed to remove the Discover, Inland Empire CU, Suntrust Bank and US Bank accounts.

12. On or about April 21, 2011, Plaintiff sent dispute correspondence to TRANSUNION regarding the many accounts that did not belong to him.

1 13. On or about April 28, 2011, Plaintiff received a response from
2 TRANSUNION indicating that the Discover, Inland Empire CU, Suntrust Bank
3 and US Bank accounts had been verified and would remain on Plaintiff's credit
4 profile.

5 14. Early in 2012 Plaintiff sent another dispute letter to TRANSUNION. On
6 February 17, 2012 TRANSUNION again verified that the Discover, Inland Empire
7 CU, Suntrust Bank and US Bank accounts belonged to him and refused to remove
8 them from Plaintiffs credit profile.

9 15. Defendant TRANSUNION has refused, despite Plaintiff's
10 correspondence to acknowledge that he was not responsible for the Discover,
11 Inland Empire CU, Suntrust and US Bank accounts.

12 16. Plaintiff sent correspondence to TRANSUNION asking that they
13 reinvestigate his account, cease any negative credit reporting and remove his
14 account from collection activity.

15 17. Plaintiff complied with all requests of each of the Defendants to
16 provide information in order to have the erroneous marks removed from his credit
17 reports. Despite the insistence of Plaintiff, the Defendants, and each of them,
18 failed to correct the errors and failed to undertake sufficient investigations upon
19 being notified of the errors.

20 18. Within the past several years, Defendants, and each of them, willfully
21 violated the provisions of the Fair Credit Reporting Act in *at least* the following
22 respects:

23 a. By willfully and negligently failing, in the preparation of the consumer
24 report concerning Plaintiff, to follow reasonable procedures to assure maximum
25 possible accuracy of the information in the report;

26 b. By willfully and negligently failing to correct, after receiving ample
27 notice, information about the Plaintiff which defendants knew, or should have
28

1 known, was incomplete and/or inaccurate;

2 c. By willfully and negligently failing to correct and/or delete the
3 incomplete and inaccurate information in Plaintiff's file after conducting an
4 investigation;

5 d. By willfully and negligently failing to conduct an adequate investigation
6 of Plaintiff's complaints, and by willfully and negligently failing to implement
7 corrective actions once the outcome of such investigations were known, or should
8 have been known, to the defendants;

9 e. By willfully and negligently failing to provide subsequent users of the
10 report with the Plaintiff's statement of dispute or a summary thereof;

11 f. By failing to follow the requirements of sections 1681c-1 and 1681c-2 in
12 responding to an identity theft report, backed up by a police report, when these
13 were sent to defendants; and,

14 g. By willfully and negligently failing to provide notice to Plaintiff of the
15 furnishing of negative credit information to credit reporting agencies.

16 19. As a proximate result of the actions of the Defendants, and each of
17 them, Plaintiff has been damaged in an amount which will be proven at time of
18 trial. As provided under the cited law, Plaintiff is entitled to actual damages, pain
19 and suffering, punitive damages, penalties, costs and attorney fees.

20 20. Plaintiff alleges that defendants, and each of them, have willfully
21 violated FCRA with respect to Plaintiff and towards others similarly situated.
22 Specifically, defendants deliberately have inefficient procedures for correcting
23 their credit files, because they know that a certain number of consumers will either
24 be intimidated or too frustrated to continuously fight back against the constant
25 onslaught of collection activities for invalid debts. Defendants, and each of them,
26 know that a certain number of consumers would rather pay than fight, even if the
27 debt is not actually owed. These defendants know that their systems intimidate
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1 consumers so they'll pay debts even if not valid or not completely valid, and in
2 that sense the defendants place the interests of their subscribers, the furnishers,
3 ahead of the interests of the consumers whose personal information they peddle
4 for profit. These facts were not disclosed to the Plaintiff and are not disclosed to
5 the borrowing public at large.

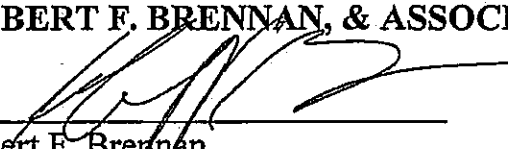
6
7 WHEREFORE, Plaintiff prays for judgment as follows:

- 8 1. For general and special damages according to proof at trial;
9 2. For punitive damages against defendants according to proof at trial and
10 using the applicable punitive damages standards from the involved statutes;
11 3. For attorney's fees where authorized by statute or law;
12 4. For costs of suit;
13 5. For such other relief as the court deems just and proper.

14 **PLAINTIFF DEMANDS A JURY TRIAL.**

15
16 Dated: July 30 2012

ROBERT F. BRENNAN, & ASSOCIATES

17 By: 
18 Robert F. Brennan
19 Attorney for Plaintiff
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Gary A. Feess and the assigned discovery Magistrate Judge is Victor B. Kenton.

The case number on all documents filed with the Court should read as follows:

CV12- 6633 GAF (VBKx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

===== :
NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☐ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Robert F. Brennan SBN 132449
 LAW OFFICES OF ROBERT F. BRENNAN
 3150 Montrose Ave.
 La Crescenta CA 91214
 Tel: 818-249-5291

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

OSCAR CRUZ, an Individual;

PLAINTIFF(S)

v.

TRANS UNION, LLC. is a corporation; and DOES
 1-10, Inclusive,

DEFENDANT(S).

CASE NUMBER

CV12-06633 GAF (VBKx)

SUMMONS

TO: DEFENDANT(S): _____

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Robert F. Brennan, whose address is 3150 Montrose Ave. La Crescenta CA 91214. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

AUG - 1 2012

Dated: _____

Clerk, U.S. District Court

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> OSCAR CRUZ, an Individual;	DEFENDANTS TRANS UNION, LLC. is a corporation; and DOES 1-10, Inclusive,
(b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases): Los Angeles County	County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only): Los Angeles, California
(c) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Robert F. Brennan, Esq. SBN 132449 LAW OFFICES OF ROBERT F. BRENNAN 3150 Montrose Ave. La Crescenta, CA 91214 Telephone 818-249-5291	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> <tr> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF	<input type="checkbox"/> 1	<input type="checkbox"/> 1	<input type="checkbox"/> 1	<input type="checkbox"/> 4	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/> 5	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6	<input type="checkbox"/> 3	<input type="checkbox"/> 3	<input type="checkbox"/> 3	<input type="checkbox"/> 6	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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IV. ORIGIN (Place an X in one box only.)
☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)
CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT: \$** 300,000

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Fair Credit Reporting Act 15 U.S.C. Sec. 1681

VII. NATURE OF SUIT (Place an X in one box only.)

400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PERSONNEL <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? ☐ No ☒ Yes

If yes, list case number(s):

FOR OFFICE USE ONLY: Case Number:

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

- ☐ Check here if the U.S. government, its agencies or employees is a named plaintiff.
 Los Angeles, California

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

- ☐ Check here if the U.S. government, its agencies or employees is a named defendant.
 TRANS UNION - Delaware

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

- Note: In land condemnation cases, use the location of the tract of land involved.
 Los Angeles County

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date August 1, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))